

Attorneys for Defendants Scott A. Caldwell, Robert M. Buchan, Randy E. Buffington, and Stephen M. Jones

1 WHEREAS, the parties participated in conferences pursuant to Federal Rule of Civil
2 Procedure 26(f) on April 24, 2019 and May 2, 2019, and thereafter have had, and continue to have,
3 communications concerning the preparation of a Rule 26(f) Report, which will include a proposed
4 discovery plan and scheduling order and request Special Scheduling Review in accordance with
5 Local Rule 26-1, as well as a Form of Production Stipulation to govern the production of
6 electronically-stored and other information and a [Proposed] Confidentiality Agreement and
7 Stipulation Protective Order;

8 WHEREAS, to provide sufficient time for the parties to complete discussions regarding
9 certain scheduling, procedural and substantive matters, counsel for the parties have conferred and
10 agreed on a date certain to file with the Court the Rule 26(f) Report, which will include a proposed
11 discovery plan and scheduling order;

12 WHEREAS, this Stipulation is entered into without prejudice to any position that the parties
13 may take in this Action;

14 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, between Plaintiff
15 and Defendants, by and through their respective counsel, and subject to the Court's approval, that:

16 The parties will file the Rule 26(f) Report, which will include a proposed discovery plan
17 and scheduling order, on or before May 22, 2019.

18 DATED: May 8, 2019

DICKINSON WRIGHT PLLC

19 /s/ John P. Desmond

20 John P. Desmond (SBN 5618)

21 Brian R. Irvine (SBN 7758)

22 Anjali D. Webster (SBN 12515)

100 West Liberty Street

Suite 940

Reno, Nevada 89501

Telephone: (775) 343-7500

24 Facsimile: (775) 786-0131

25 jdesmond@dickinson-wright.com

26 birvine@dickinson-wright.com

27 awebster@dickinson-wright.com

Robert A. Sacks (admitted pro hac vice)
SULLIVAN & CROMWELL LLP
1888 Century Park East
Los Angeles, California 90067
Telephone: (310) 712-6600
Facsimile: (310) 712-8800
sacksr@sullcrom.com

Laura Kabler Oswell (admitted pro hac vice)
SULLIVAN & CROMWELL LLP
1870 Embarcadero Road
Palo Alto, California 94303
Telephone: (650) 461-5600
Facsimile: (650) 461-5700
oswelll@sullcrom.com

Attorney for Defendants Scott A. Caldwell,
Robert M. Buchan, Randy E. Buffington, and
Stephen M. Jones

/s/ Martin A. Muckleroy
Martin A. Muckleroy (SBN 9634)
MUCKLEROY LUNT, LLC
6077 S. Fort Apache Rd., Ste. 140
Las Vegas, NV 89148
Telephone: (702) 907-0097
Facsimile: (702) 938-4065
martin@muckleroylunt.com

BROWER PIVEN
A Professional Corporation
Charles J. Piven (admitted pro hac vice)
1925 Old Valley Road
Stevenson, MD 21153
Telephone: (410) 332-0030
Facsimile: (410) 685-1300
piven@browerpiven.com

BROWER PIVEN
A Professional Corporation
David A.P. Brower (admitted pro hac vice)
136 Madison Avenue, 5th Floor
New York, NY 10016
Telephone: (212) 501-9000
Facsimile: (212) 501-0300
brower@browerpiven.com

ROBBINS GELLER RUDMAN
& DOWD LLP

Samuel H. Rudman (admitted pro hac vice)

Joseph Russello (admitted pro hac vice)

William J. Geddish (admitted pro hac vice)

58 South Service Road, Suite 200

Melville, New York 11747

Telephone: (631) 367-7100

Facsimile: (631) 367-1173

srudman@rgrdlaw.com

jrussello@rgrdlaw.com

wgeddish@rgrdlaw.com

Attorneys for Plaintiff Andrey Slomnitsky

* * *

IT IS SO ORDERED.

DATED: May 9, 2019.

William G. Cobb

THE HONORABLE WILLIAM G. COBB
UNITED STATES MAGISTRATE JUDGE